

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

KAJEET, INC.,)	
)	
Plaintiff,)	CASE NO. 6:20-CV-203
)	
vs.)	JURY TRIAL REQUESTED
)	
LIGHTSPEED SOLUTIONS, INC.,)	
)	
Defendant.)	

**DECLARATION OF ROB CHAMBERS IN SUPPORT OF
DEFENDANT'S MOTION FOR INTRA-DISTRICT TRANSFER**

I, ROB CHAMBERS, declare as follows:

1. I am currently employed as Vice President of Customer Success with Lightspeed Solutions, Inc. ("Lightspeed"). Previously, I was employed as Vice President of Product with Lightspeed. I work in Austin, Texas, and live just outside of Austin in Round Rock, Texas.
2. I submit this declaration in support of Lightspeed's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I have been informed and understand that, in the litigation, Plaintiff Kajeet, Inc. ("Kajeet") has accused Lightspeed of patent infringement and that Kajeet has filed the suit in the Waco Division of the Western District of Texas. I am further informed and understand that the Waco Division of the Western Division of Texas includes the following counties: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell.

3. Lightspeed has been located in Austin, Texas since 2014. In addition, Lightspeed's current headquarters are located in Austin, Texas and have been located there since 2016. Prior to 2016, Lightspeed's headquarters were located in Bakersfield, California; that Bakersfield office is now closed.

4. In addition to its headquarters, Lightspeed also has a second location in Austin. All told, Lightspeed has significant operations in Austin. Lightspeed currently employs approximately eighty (80) people in Austin, including employees with responsibilities related to the Accused Products.

5. In addition to the two Austin locations, Lightspeed has an office in Portland, Oregon, which employs approximately fifteen (15) people. Lightspeed also has an office in Essex, United Kingdom.

6. Lightspeed does not maintain any facilities or operations in the Waco Division of the Western District of Texas. Lightspeed has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

7. I am informed and understand that Kajeet's Complaint focuses on Lightspeed's Relay Platform and Mobile Manager products and services ("Accused Products"), which are allegedly covered by a patent owned by Kajeet. Complaint, ¶¶ 22, 46-48. I am further informed and understand that Kajeet has asked the court for money damages. Complaint, ¶¶ 50-51, § VII. The Lightspeed employees with the most relevant knowledge related to the Relay Platform and Mobile Manager products include myself and Lightspeed's other executive officers. With one exception, Lightspeed's executive officers all live and work in Austin; the one exception lives and works in Portland.

8. Lightspeed has not identified any employees with knowledge of the matters relevant to the Accused Products that work in the Waco Division.

9. Lightspeed's engineering, sales, marketing, and financial documents related to the Relay Platform and Mobile Manager products and services are located in Austin, and all company-owned servers on which such documents are stored are also located in Austin. I understand that Lightspeed does not maintain any of these documents relating to the Relay Platform and Mobile Manager products and services in the Waco Division.

10. In addition, all legacy versions of code related to the Accused Products and all backups of such code are stored on servers located in Austin.

11. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 4, 2020



Rob Chambers

Vice President of Customer Success

Lightspeed Solutions, Inc.